

REMARKS

Claims 1 – 3, 6, 17 – 18, 20 – 21, 24 – 25, 31, and 33 – 36 are pending. Claims 4, 5, 7 – 9, 10 – 13, 19, 27 – 30, and 32 have been cancelled. Claims 34 – 36 have been added. Claim 1, 6, 17, 18, and 24 have been amended. No new matter has been introduced. Reexamination and reconsideration of the application are respectfully requested.

In the December 2, 2005 Office Action, the Examiner objected to claim 1 because line 11 is missing a period. The applicant has added the period and respectfully submits that the rejection to claim 1 should be withdrawn.

In the December 2, 2005 Office Action, the Examiner rejected claims 1 – 3, 7, 10 – 13, 17 – 18, 20, 24 – 25, 27, and 29 – 33 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,286,038 to Reichmeyer et al. ("the Reichmeyer reference"). The Examiner rejected claim 21 under 35 U.S.C. § 103(a) as being unpatentable over the Reichmeyer reference in view of it being well known in the art to set a time out condition. The Examiner rejected claims 4 – 6, 8 – 9, 19, and 28 under 35 U.S.C. § 103(a) as being unpatentable over the Reichmeyer reference in view of U.S. Published Patent Application No. 2004/0068576 to Lindbo ("the Lindbo reference"). These rejections are respectfully traversed, as they are applicable to the presently pending claims.

Independent claim 34 distinguishes over the Reichmeyer and Lindbo references.

Independent claim 34 recites:

A method for configuring a headless device, comprising:  
**requesting, from a DHCP server, a routable IP address;**  
**selecting a stored routable IP address from an alternative**  
**routable address storage at the headless device if the requesting of**  
**the routable IP address from the DHCP server was not successful;**  
sending, by a self-initiated configuration mechanism in the

headless device, a configure service request to a configuration service mechanism across a network, the service request asking for a configuration specification corresponding to the headless device; and receiving from the configuration service mechanism, the configuration specification to the self-initiated configuration mechanism at the headless device and configuring the headless device according to the configuration specification.

The Reichmeyer reference does not disclose the method of configuring a headless device of claim 34. The Examiner states that the Reichmeyer reference does not set forth the limitation of selecting a routable address from an alternative routable address storage in the headless device. (*Office Action, page 7*). The applicant agrees with the Examiner and respectfully submits that claim 34 distinguishes over the Reichmeyer reference.

The Lindbo reference does not make up for the deficiencies of the Reichmeyer reference. The Examiner states that the Lindbo reference teaches maintaining of a list of alternative addresses in order to allow a request to be routed to its destination in an event of a primary route failure. (*Office Action, page 7*). The applicant respectfully disagrees with the Examiner's statement. The Lindbo reference is disclosing that the interceptor originally intercepts a request in order to determine if closer, local resources are available. In other words, the Lindbo reference interceptor is not intercepting and rerouting the request in the case of a failure. Instead, the interceptor is intercepting and rerouting automatically with each request that passes through the interceptor.

In paragraph 27 of the Lindbo reference (which the Examiner states discloses the above-identified limitation), the Lindbo reference discloses that the interceptor 20 intercepts an information request from an Internet user directed to an Internet content provider, determines whether the intercepted request is directed to a content provider

that has an associated alternative address on a local server 40, and directs the request to an alternative address if the alternative address exists having the requested information. (*Lindbo, Abstract and paragraph [0027]*). The Lindbo reference is directed to a separate device which is separate and apart from the user device (the user device being akin to the headless device) that intercepts communications. The Lindbo reference does not disclose that the interceptor receives any indication from a server to which the request is addressed that the request has failed (because the server does not have the necessary information). Instead, after the interceptor intercepts the communication, it checks a table to see if there are any alternative addresses where the information is available locally. (*Lindbo, paragraphs [0021 – 0022]*).

This is not the same as a method for configuring a headless device, including **requesting, from a DHCP server, a routable IP address and selecting a stored routable IP address from an alternative routable address storage at the headless device if the requesting of the routable IP address from the DHCP server was not successful.** The Lindbo reference is in no way requesting a routable IP address from a DHCP server because it is looking for information from web sites. In addition, while the Lindbo reference does disclose receiving an information request, looking up in a table whether the information requested is available at another local address, and re-routing the information request to the local address if the information is available locally, the Lindbo reference does not disclose that any action occurs because the request to the DHCP server was not successful. Instead, the Lindbo reference “teaches away” from performing an action if the request to the DHCP server was unsuccessful because the Lindbo reference’s interceptor automatically checks to see if the information is available

locally. In addition, the interceptor is separate and apart from the user device (akin to the headless device) and thus cannot retrieve **a stored routable IP address from storage at the user device** (headless device), as is recited in claim 34. Accordingly, applicant respectfully submits that claim 34 distinguishes over the Lindbo / Reichmeyer combination.

Independent claims 35 and 36 recite limitations similar to claim 34. Accordingly, applicant respectfully submits that claims 35 and 36 distinguish over the Reichmeyer / Lindbo combination for reasons similar to those discussed above in regard to claim 34.

Claim 1, as amended, distinguishes over the cited references. Claim 1, as amended, recites:

A method for configuring a headless device, comprising:  
**retrieving a pre-stored DHCP address from DHCP address storage in the headless device;**  
**transmitting a request to the DHCP server using the pre-stored DHCP address to obtain a routable address for the headless device;**  
sending, by a self-initiated configuration mechanism in the headless device, a configure service request to a configuration service mechanism across a network, the service request asking for a configuration specification corresponding to the headless device and the configuration service mechanism identified by the routable IP address;  
receiving from the configuration service mechanism, the configuration specification to the self-initiated configuration mechanism at the headless device; and  
configuring, by the self-initiated configuration mechanism in the headless device, the headless device according to the configuration specification received from the configuration service mechanism.

The Reichmeyer reference does not disclose, teach, or suggest the highlighted limitation of claim 1. The Reichmeyer reference discloses that when a DHCP client boots, it transmits a DHCP discover message on each local subnet (to which the DHCP client is connected) to DHCP servers connected to such networks. The DHCP client receives offer messages that includes available network IP addresses and then selects

one server from which to request configuration parameters. The DHCP client broadcasts a DHCP request message to each DHCP server and the message identifies the server selected. The DHCP server selected then responds with an acknowledgment message containing the configuration parameters requested by the client device. (*Reichmeyer, col. 4, lines 4 – 20*).

This is not the same as a method for configuring a headless device, including **retrieving a pre-stored DHCP address from DHCP address storage in the headless device and transmitting request to the DHCP server using the pre-stored DHCP address to obtain a routable address for the headless device.** It is not the same because the Reichmeyer reference is disclosing that its client/network device (akin to the headless device of claim 1) does not have a DHCP address stored in the client because it has to transmit a DHCP discover message in order to obtain the DHCP address. In other disclosed embodiments, the Reichmeyer reference discloses that if a network device is preconfigured, there is no delivery mechanism needed for configuration parameters because the parameters are already installed on the machine. The Reichmeyer reference also discloses that a networking device may receive a configuration file by having the configuration file copied from the removable storage media to the network device. In addition, the Reichmeyer reference also discloses that a system administrator can utilize remote manual configuration in order to install a configuration onto the network device. However, as noted above, none of these other disclosed embodiments, disclose that a DHCP server address is pre-stored in DHCP address storage in the headless device. For these embodiments, the address would not have to be pre-stored because the configuration parameters are being obtained in

another fashion. Accordingly, the Reichmeyer reference does not disclose, in any of the disclosed embodiments, the **retrieving of a pre-stored DHCP address from DHCP address storage on a headless computing device**, as is recited in claim 1, as amended. Accordingly, claim 1, as amended, distinguishes over the Reichmeyer reference.

The Lindbo reference does not make up for the deficiencies of the Reichmeyer reference. The Examiner utilizes the Lindbo reference to disclose maintaining of a list of alternative addresses in order to allow a request to be routed to its destination in an event of a primary route failure. As noted above, the applicant disagrees with the Examiner's statement because the Lindbo reference is not dealing with a primary route failure. Assuming, *arguendo*, that the Lindbo reference discloses all the Examiner states that it does, it does not disclose a method for configuring a headless device, including **retrieving a pre-stored DHCP address from DHCP address storage in the headless device and transmitting request to the DHCP server using the pre-stored DHCP address to obtain a routable address for the headless device**. Accordingly, applicant respectfully submits that claim 1, as amended, distinguishes over the Lindbo / Reichmeyer combination.

Independent claims 17 and 24, both as amended, recite limitations similar to claim 1, as amended. Accordingly, applicant respectfully submits that claims 17 and 24 distinguish over the Reichmeyer / Lindbo combination for reasons similar to those discussed above in regard to claim 1.

Claims 2 – 3, 6, 18, 20 – 21, 25, 31, and 33 depend, indirectly or directly, on claims 1, 17, and 24, respectively. Accordingly, applicant respectfully submits that


claims 2 – 3, 6, 18, 20 – 21, 25, 31, and 33 distinguish over the Reichmeyer / Lindbo combination for the same reasons discussed above in regard to claim 1, as amended.

Applicant believes that the claims are in condition for allowance, and a favorable action is respectfully requested. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles telephone number (213) 488-7100 to discuss the steps necessary for placing the application in condition for allowance should the Examiner believe that such a telephone conference would advance prosecution of the application.

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN LLP

Date: May 2, 2006

By:   
Mark R. Kendrick  
Registration No. 48,468  
Attorney for Applicant(s)

725 South Figueroa Street, Suite 2800  
Los Angeles, CA 90017-5406  
Telephone: (213) 488-7100  
Facsimile: (213) 629-1033